

July 15, 2014

Dear Commissioners,

The Federal Communications Commission is proposing to reclassify the Internet from a Title I information service to a Title II communication service. As I understand it, that would make the Internet a common carrier with the need to follow rules that have their roots in the Telecommunications Act of 1939.

My name is Austin Curry and I am the Executive Director of Elder Care Advocacy of Florida.

Seniors are high on everyone's list of among the most vulnerable population communities throughout the nation, but Florida has the highest concentration of seniors in the U.S. According to the 2010 census we led the nation with 17.3 percent of our residents 65 years old or older. Nationally, the percentage of seniors is only 13.9 percent according to the CIA World Factbook.

The baby boomers began turning 65 in 2011. According to the Pew Research organization since 2011 (when the first baby boomers reached senior status) 10,000 per day are turning 65 - a trend that will continue for another 16 years. The Baby Boomer cohort makes up more than a quarter of the U.S. population.

All this statistical information is necessary to lay the foundation for our opposition to the reclassification of the Internet. Today's seniors are the last group that will remember why we still call it "dialing a phone," what a Walkman is, when cell phones weighed a pound and only made phone calls, and the screech of a dial-up modem. Younger generational groups have only known push-button phones, iPods, phones that call and text, and a high-speed connection to the Internet.

This is an important sociological point because baby boomers grew up with the Internet, cell phones, and MP3 players and all the other technological advances we've been blessed with for the past 25 years. To that end, our seniors – unlike the diminishing number of our citizens who are 80 years and above – have no fear of technology; They've used it, they understand it, they're comfortable with it and, indeed, they are impatient with technology that doesn't measure up to the standards they have become used to.

Today's baby boomers use the Internet at work, at home, to pay bills, to check on the status of health insurance claims, and keep up with the news (and weather) "back home." Baby boomers also use the internet to have video chats with their children and grandchildren no matter where in the nation or in the world their families are living. In return, the children of boomers use video calls to check on their parents. Asking "How are you doing?" is one thing. Actually looking at a high resolution video of their mom or dad can tell an interested child much more about the physical and mental health of their folks.

Having said all that, it is clear to me that treating the Internet as a common carrier – a utility – will be seen as a step backward for this group and older population segments. As the baby boomers continue to age they will make far greater use of tele-health apps and programs. They will continue to be able to earn a living working from home over broadband connections. They will order pharmaceuticals, read books, and keep up with modern culture even after driving regularly has become problematic.

For seniors of minority origins, the ability to get information on health, job, or other issues in their preferred language is of incalculable importance. For many it is the difference between remaining independent and being forced into a senior facility – often at taxpayer expense.

As more Americans retire and have fixed incomes, the cost of many items that, when they were working, were well within their budgets, now become unnecessary luxuries. That, if we are not very careful, will include even basic broadband connections to the internet. If the FCC does, in fact, reclassify the Internet new rules, regulations, law suits, studies, lobbying, Congressional hearings, and bureaucrats making themselves essential to the process will inevitably increase the cost of doing business for every organization across the Internet ecosystem.

These costs will be pushed down the value chain until they reach the ultimate consumer: The citizen in their homes. Even a small increase in fees with no increase in service (the working definition of government-driven costs) will mean there will be seniors who have to choose between having a broadband connection to the Internet and other necessities.

We urge the FCC to leave the Internet as a Title I information service. Our seniors are comfortable with the rate of innovation and change. They will not be comfortable putting improvements to the Internet in reverse which is what making it a Title II service would do.

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